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[Additional Counsel Appear on Signature Pages]

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTHERN CALIFORNIA
SAN JOSE DIVISION

IN RE: LENOVO ADWARE LITIGATION

This Document Relates to All Cases

Case No. 5:15-md-02624-RMW

STIPULATION AND [PROPOSED] ORDER RE
BRIEFING ON LENOVO'S MOTION TO
DISMISS THE CONSOLIDATED AMENDED
COMPLAINT

WHEREAS plaintiffs filed their Consolidated Amended Complaint (“Complaint”) on November 12, 2015. *See* Dkt. No. 61.

WHEREAS defendant Lenovo (United States), Inc. filed its motion to dismiss the Complaint on January 21, 2016. *See* Dkt. No. 98.

WHEREAS, as set forth in the Declaration of Daniel J. Stephenson in support of Lenovo’s motion to dismiss, prior to filing the motion, counsel for the parties conferred on an appropriate hearing date that would not cause undue prejudice. *See* Dkt. No. 98-2 at ¶ 3. The parties agreed on a March 11, 2016 hearing date, predicated on plaintiffs having four weeks to prepare and file their opposition to the motion and Lenovo having two weeks to prepare and file its reply.

WHEREAS Lenovo’s motion to dismiss has been set for hearing on March 11, 2016, but the briefing schedule set by the Court allows plaintiffs only two weeks for their opposition and Lenovo only one week for its reply. *See* Dkt. No. 98.

WHEREAS the parties have conferred and agreed that, subject to Court approval, the date by which plaintiff shall file their opposition to the motion to dismiss should be extended from February 4, 2016 to February 19, 2016, and the date for Lenovo to file its reply papers should be extended from February 11, 2016 to March 4, 2016.

NOW THEREFORE, the parties, by and through their respective counsel of record, hereby stipulate as follows:

1. The date by which plaintiffs shall file their opposition to Lenovo’s motion to dismiss should be extended from February 4, 2016 to February 19, 2016;

2. The date by which Lenovo shall file its motion to dismiss reply papers shall be extended from February 11, 2016 to March 4, 2016; and

3. The hearing shall remain as noticed on March 11, 2016.

Dated: January 22, 2016

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Counsel for Defendant Lenovo

PROPOSED ORDER

Pursuant to Stipulation, it is SO ORDERED.

DATED: _____

HONORABLE RONALD M. WHYTE
UNITED STATES DISTRICT COURT JUDGE

ATTESTATION

I, Jonathan K. Levine, am the ECF user whose ID and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I hereby attest that all other signatories listed have concurred in this filing.

/s/ Jonathan K. Levine

Jonathan K. Levine